

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** QTS Hillsboro II, LLC Sewer Pipeline Crossing Through Keller-Alston No. 1 Right-of-Way

**Project No.:** LURR 20240373

**Project Manager:** Laura Master, TERR - 3

**Location:** Washington County, Oregon

**Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021):** B4.9 Multiple use of powerline rights-of-way

**Description of the Proposed Action:** Bonneville Power Administration (BPA) proposes to allow QTS Hillsboro II, LLC (the applicant) to install an underground sanitary sewer pipeline through BPA fee-owned Right-of-Way (ROW) between structures 3/1 and 3/2 on the Keeler-Alston No. 1 transmission line in Hillsboro, Washington County, Oregon. The proposed action is to support the construction of two data centers in Washington County, Oregon.

The applicant would directional bore 505 feet through BPA's Right-of-Way (ROW) and install 3-inch polyvinyl chloride (PVC) pipeline 5 feet below the ground surface. The sewer line would run perpendicular to the ROW in a west to east direction, where it would connect to an existing sewer main outside of the ROW. No surface-level ground disturbance would be required on BPA fee-owned property. Construction equipment that may be seen around the work site would include a bore machine, construction vehicles, small excavator, and additional construction tools. Any required equipment and material staging for the proposed actions would take place off BPA fee-owned property.

BPA authorizes the use of and manages its fee-owned lands pursuant to its authority under sections 2(e) and 2(f) of the Bonneville Project Act. 16 U.S.C. § 832a(e)-(f).

**Findings:** In accordance with Section 1021.410(b) of the Department of Energy's (DOE) National Environmental Policy Act (NEPA) Regulations (57 FR 15144, Apr. 24, 1992, as amended at 61 FR 36221-36243, Jul. 9, 1996; 61 FR 64608, Dec. 6, 1996; 76 FR 63764, Nov. 14, 2011; 89 FR 34074, April 30, 2024), BPA has determined that the proposed action:

- 1) fits within a class of actions listed in Appendix B of 10 CFR 1021, Subpart D (see attached Environmental Checklist);
- 2) does not present any extraordinary circumstances that may affect the significance of the environmental effects of the proposal; and
- 3) has not been segmented to meet the definition of a categorical exclusion.

Based on these determinations, BPA finds that the proposed action is categorically excluded from further NEPA review.<sup>1</sup>

Justin M. Olmsted  
Environmental Protection Specialist

Concur:

Katey C. Grange  
NEPA Compliance Officer

Attachment(s): Environmental Checklist

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<sup>1</sup> BPA is aware that the Council on Environmental Quality (CEQ), on February 25, 2025, issued an interim final rule to remove its NEPA implementing regulations at 40 C.F.R. Parts 1500–1508. Based on CEQ guidance, and to promote completion of its NEPA review in a timely manner and without delay, in this CX BPA is voluntarily relying on the CEQ regulations, in addition to DOE's own regulations implementing NEPA at 10 C.F.R. Part 1021, to meet its obligations under NEPA, 42 U.S.C. §§ 4321 et seq.

# Categorical Exclusion Environmental Checklist

This checklist documents environmental considerations for the proposed project and explains why the project would not have the potential to cause significant impacts on environmentally sensitive resources and would meet other integral elements of the applied categorical exclusion.

**Proposed Action:** QTS Hillsboro II, LLC Sewer Pipeline Crossing Through Keller-Alston No. 1 Right-of-Way

## **Project Site Description**

The project site on BPA ROW is located just north of Oregon HWY-26 and 2.6 miles northeast of Portland-Hillsboro airport (Township 1 North, Range 2 West, Section 15). The local area has expanded to include industrial and commercial businesses, housing developments, and other infrastructure. Agricultural easements within this portion of ROW have been used for crop production and as a result, farm-related ground disturbance is a common occurrence within the ROW. The new data centers would be located to the west and a sanitary sewer line would be routed from the buildings, through the ROW, and into the existing sewer mainline.

## **Evaluation of Potential Impacts to Environmental Resources**

### **1. Historic and Cultural Resources**

Potential for Significance: No

Explanation: BPA Cultural Resources staff have reviewed the proposed actions and determined it does not have the potential to effect historic properties pursuant to 36 CFR 800.3(a)(1).

### **2. Geology and Soils**

Potential for Significance: No

Explanation: Ground disturbing activities on BPA ROW would occur exclusively below the ground surface and would consist of boring east-west perpendicular to the Keller-Alston No. 1 transmission line. No other soil disturbance or excavation would occur on BPA property. The applicant would implement typical construction best management practices (BMPs) to address temporary erosion and sediment control, as well as return the ROW surface to the preexisting land contour. Therefore, the proposed action would have limited impact to soil and no impact to geology.

### **3. Plants (including Federal/state special-status species and habitats)**

Potential for Significance: No

Explanation: Prior to entering BPA property, vehicles and equipment would be washed and inspected thoroughly for plant seeds that could otherwise be introduced during construction activities. No existing vegetation would be impacted with BPA ROW. Therefore, the proposed actions would not impact this resource.

### **4. Wildlife (including Federal/state special-status species and habitats)**

Potential for Significance: No

Explanation: Minor and temporary disturbance of normal wildlife behavior and wildlife displacement could occur from elevated noise and human presence during construction activities. However, there would be no permanent impacts to wildlife habitat, and temporarily disturbed or displaced wildlife would likely reoccupy the site following completion of the proposed action. There are no documented occurrences of any special-status wildlife species near the project site and no suitable special-status species habitat is present according to best available data.

## **5. Water Bodies, Floodplains, and Fish (including Federal/state special-status species, ESUs, and habitats)**

Potential for Significance: No

Explanation: Various irrigation ditches associated with agricultural practices are present near the project site; however, there are no ditches present within the project site and no work is proposed within any water body or floodplains. BMPs would be used for erosion control measures, and the applicant is required to follow all local, state, and federal regulations pertaining to these resources, as required. Therefore, the proposed action would not impact water bodies, floodplains, or any fish including federal or state special-status species or their habitats.

Notes:

- The applicant is not authorized to use or store any hazardous materials (i.e., fuels, herbicides, solvents, paints, etc.) within BPA ROW.

## **6. Wetlands**

Potential for Significance: No

Explanation: The closest wetland habitat is located approximately 1000 feet to the northwest. There are no wetlands present within the project site and no work is proposed within the surrounding wetland. Therefore, the proposed actions would have no impact to wetlands.

## **7. Groundwater and Aquifers**

Potential for Significance: No

Explanation: Directional boring may reach groundwater depths; however, the proposed actions would not generate or use hazardous materials that would contaminate groundwater or aquifers. No new wells or other uses of groundwater or aquifers are proposed.

## **8. Land Use and Specially-Designated Areas**

Potential for Significance: No

Explanation: Existing agricultural rights are established within this section of BPA's ROW. The applicant has agreed to work with the easement holders to identify an appropriate construction window to bore outside of the growing season. There would be no changes to land use or specially-designated areas as a result of the proposed actions.

## **9. Visual Quality**

Potential for Significance: No

Explanation: The applicant would install the sewer line by directional boring 5 feet below the ground surface. Construction vehicles and equipment may be visible near the ROW, but these changes would not be permanent. Overall, the proposed action would have minimal impact to the visual quality of the ROW.

## 10. Air Quality

Potential for Significance: No

Explanation: Minor dust and vehicle emissions would likely result during project activities; however, these impacts would be temporary and would stop once construction is complete. There would be no permanent changes to air quality as a result of this project.

## 11. Noise

Potential for Significance: No

Explanation: Construction activities would result in a temporary increase in noise during daylight hours; however, noise would return to preconstruction levels following project completion. There would be no permanent changes to noise as a result of this project.

## 12. Human Health and Safety

Potential for Significance: No

Explanation: All standard safety protocols would be followed throughout implementation of the proposed action to minimize risk to human health and safety. Therefore, the proposed action would not be expected to impact human health and safety.

### **Evaluation of Other Integral Elements**

The proposed project would also meet conditions that are integral elements of the categorical exclusion. The project would not:

**Threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, or similar requirements of DOE or Executive Orders.**

Explanation: N/A

**Require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators) that are not otherwise categorically excluded.**

Explanation: N/A

**Disturb hazardous substances, pollutants, contaminants, or CERCLA excluded petroleum and natural gas products that preexist in the environment such that there would be uncontrolled or unpermitted releases.**

Explanation: N/A

**Involve genetically engineered organisms, synthetic biology, governmentally designated noxious weeds, or invasive species, unless the proposed activity would be contained or confined in a manner designed and operated to prevent unauthorized release into the environment and conducted in accordance with applicable requirements, such as those of the Department of Agriculture, the Environmental Protection Agency, and the National Institutes of Health.**

Explanation: N/A

## **Landowner Notification, Involvement, or Coordination**

Description: The applicant would coordinate with BPA, easement holders, and all applicable landowners, as required.

Based on the foregoing, this proposed project does not have the potential to cause significant impacts to any environmentally sensitive resource.

Signed:

Justin M. Olmsted  
Environmental Protection Specialist